

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.	)	CASE NO. 1:08 CV 2755
	)	
Plaintiff,	)	JUDGE: LESLEY WELLS
	)	MAGISTRATE JUDGE: GREG WHITE
-vs-	)	
SAP AMERICA, INC., et al.	)	<b><u>UNOPPOSED MOTION FOR</u></b>
	)	<b><u>EXTENSION TO FILE REPLY TO</u></b>
	)	<b><u>OBJECTIONS FILED BY THE SAP AND</u></b>
Defendants.	)	<b><u>LSi DEFENDANTS</u></b>
	)	
	)	<b><u>AND;</u></b>
	)	<b><u>MOTION TO EXCEED PAGE</u></b>
	)	<b><u>LIMITATIONS</u></b>

Plaintiff Hodell-Natco Industries, Inc. (“Hodell”), through undersigned counsel, requests that the Court enter an Order granting Hodell a brief four (4) day extension until August 23, 2013 in which to file its respective Reply Briefs to the Objections filed by defendants SAP America Inc., and SAP AG (“SAP”) (ECF #187) and LSi-Lowery Systems, Inc. and The IBIS Group, Inc. (“LSi”) (ECF #188) with regard to the Report and Recommendation issued by Judge White recommending that both defendants’ Motions for Summary Judgment be denied (ECF ##182, 183).

Additionally, Hodell requests a minor extension of the 20-page limitation applicable to Hodell’s Reply Briefs. The bases for these requests are as follows:

1. SAP and LSi filed their Objections to Judge White’s Report and Recommendation on August 5, 2013. Hodell’s Replies to those Objections are currently due on August 19, 2013.

2. Due to intervening travel schedules, other business obligations, and the need to reply to both SAP's and LSi's briefs simultaneously, counsel for Hodell requests a brief four (4) day extension until August 23, 2013 in which to file its Replies to the SAP and LSi Objection briefs.

3. Hodell also requests a minor modification of the applicable page limitations for its Reply Briefs so that Hodell may adequately address each argument raised in the SAP and LSi Objection briefs. Hodell will endeavor to keep each Reply Brief with the applicable page limitation of 20 pages, but out of an abundance of caution, requests an extension to twenty-five (25) pages for both Reply Briefs to ensure that Hodell is granted a full and fair opportunity to respond to each objection raised by SAP and LSi.

4. SAP and LSi do not oppose the requested extensions, and granting the requested extension is consistent with the reciprocal courtesy extensions previously afforded by Hodell to both SAP and LSi.

WHEREFORE, Hodell requests that this Court enter an order allowing Hodell until August 23, 2013 to file its Reply Briefs to the Objections filed by SAP (ECF #187) and LSi (ECF #188). Hodell further requests a page limitation of 25 pages for replying to each Objection.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of August, 2013, a copy of the foregoing was filed electronically. Parties may access this filing through the Court's electronic filing system.

/s/ P. Wesley Lambert  
P. WESLEY LAMBERT (0076961)